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Attorneys for Defendants
Xoom Corporation, John Kunze,
and Ryno Blignaut

Additional counsel listed on signature page

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

ALEXANDER LIU, Individually and On Behalf of
All Others Similarly Situated,

Plaintiff,

vs.

XOOM CORP., JOHN KUNZE, AND RYNO
BLIGNAUT,
Defendants.

Case No. 5:15-cv-00602-LHK

CLASS ACTION

**STIPULATION TO EXTEND TIME TO
RESPOND TO COMPLAINT**

DATE ACTION FILED: 1/6/2015
(Removed 2/6/2015)

1 WHEREAS, on January 6, 2015, plaintiff Alexander Liu (“Plaintiff”) filed in the Superior
2 Court of the State of California, County of San Francisco, a complaint (the “Complaint”) entitled
3 *Alexander Liu vs. Xoom Corp., et al.*, Case No. CGC-15-543531, ostensibly on behalf of a class of
4 all similarly-situated individuals who purchased common stock of Xoom Corporation (“Xoom”)
5 allegedly pursuant and/or traceable to Xoom’s Registration Statement and Prospectus, declared
6 effective by the Securities and Exchange Commission on February 14, 2013, issued in connection
7 with Xoom’s Initial Public Offering (the “State Court Action”);

8 WHEREAS, on February 6, 2015, defendants Xoom, John Kunze, and Ryno Blignaut
9 (collectively, “Defendants”) filed in this Court a Notice of Removal of the State Court Action;

10 WHEREAS, Defendants did not answer, move, or otherwise respond to the Complaint before
11 filing their Notice of Removal;

12 WHEREAS, Plaintiff intends to move to remand this action;

13 WHEREAS, Defendants intend to oppose Plaintiff’s motion to remand;

14 WHEREAS, the parties understand that Federal Rule of Civil Procedure 81(c) requires
15 Defendants to answer, move, or otherwise respond to the Complaint on or before February 13, 2015;

16 WHEREAS, no party has requested any time modifications in this action; and

17 WHEREAS, Defendants intend to move to dismiss the Complaint.

18 NOW, THEREFORE, PURSUANT TO CIVIL LOCAL RULES 6-2 AND 7-12, IT IS
19 HEREBY STIPULATED AND AGREED, by and between the undersigned, as follows:

- 20 1. Plaintiff shall file his motion to remand on or before February 27, 2015;
- 21 2. Defendants shall file their opposition to Plaintiff’s motion to remand no later than
22 thirty (30) days after the motion to remand is filed;
- 23 3. Plaintiff shall file his reply brief in support of his motion to remand no later than
24 seven (7) days after Defendants’ opposition is filed;
- 25 4. Defendants shall not be required to answer, move to dismiss, or otherwise respond to
26 the Complaint pending a decision by the Court on Plaintiff’s motion to remand;
- 27 5. If the Court denies Plaintiff’s motion to remand, the parties will confer in good faith
28 regarding a schedule for filing of an amended complaint and the briefing of Defendants’ motion to

1 dismiss, and Defendants will not be required to answer, move to dismiss, or otherwise respond to the
2 Complaint until the parties submit a proposed stipulation regarding a schedule for the briefing of
3 Defendants' motion to dismiss;

4 6. If the Court grants Plaintiff's motion to remand, Plaintiff intends to file an amended
5 complaint within thirty days after entry of an order remanding this action; and

6 7. Nothing in this Stipulation shall be construed as a waiver of any of Defendants' rights
7 or positions in law or equity, or as a waiver of any defenses that Defendants would otherwise have,
8 including, without limitation, service of process and jurisdictional defenses.

9 IT IS SO STIPULATED.

10
11 Dated: February 12, 2015

Respectfully submitted,

12 **GOODWIN PROCTER LLP**

13
14 By: /s/ Brian E. Pastuszewski
15 Brian E. Pastuszewski (*pro hac vice*)
16 Teodora Manolova (SBN 233333)
Nicole L. Chessari (SBN 259970)

17 *Attorneys for Defendants Xoom Corporation,
John Kunze, and Ryno Blignaut*

18
19 Dated: February 12, 2015

20 By: /s/ Laurence M. Rosen
21 Laurence M. Rosen (SBN 219683)
22 *lrosen@rosenlegal.com*
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Fax: 213.226.4684

23 *Attorney for Plaintiff Alexander Liu*

ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: _____, 2015

The Honorable Lucy H. Koh
United States District Court Judge

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CIVIL L.R. 5-1 ATTESTATION

I, Brian E. Pastuszenski, am the ECF User whose ID and Password are being used to file this **STIPULATION TO EXTEND TIME TO RESPOND TO COMPLAINT**. In compliance with Civil L.R. 5-1(i)(3), I hereby attest that Laurence M. Rosen, counsel for Plaintiff Alexander Liu, has concurred to its filing.

Dated: February 12, 2015

/s/ Brian E. Pastuszenski
Brian E. Pastuszenski

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/s/ Brian E. Pastuszewski
 Brian E. Pastuszewski